REMARKS

Claims 1-14 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Watanabe (US 6,539,240 B1) in view of the newly cited Bickmore et al. This rejection is respectfully disagreed with, and istraversed below.

As was previously argued, Watanabe describes a data communication system that has a receiver for receiving a first character that represents a communication target, an action storage for storing data that represent various actions of a second character representing a user, and a device to specifying an action of the second character by using an operation member. A transmitter reads the data of the second character corresponding to the specified action and transmits the data to the communication target. A synthesizer is provided for synthesizing the data received by the receiver and the data read from the action storage for displaying a synthesized image having the first and second characters. A character corresponding to a user can be displayed, and when an action of the character is specified, image data is transmitted that corresponds to the action.

The Examiner acknowledges that Watanabe does not disclose that the synthesized image comprises a bookmark component that comprises at least one address corresponding to a resource that is reachable by a user of the entity (synthesized image) through a data communications network, but uses Bickmore et al. for purportedly teaching this subject matter.

The Examiner's characterization of Bickmore et al. is respectfully disagreed with.

First, it is not admitted that the Watanabe and Bickmore et al. teachings are in an analogous art. Watanabe teaches a character that is sent from a transmitter to a receiver for display at the receiver, while Bickmore et al. teach an avatar that is associated with a HTML document.

Further, the avatar of Bickmore et al. is not seen to be disclosed as "comprising a bookmark component that comprises at least one address corresponding to a resource that is reachable by a user of the entity through a data communications network".

What is actually stated in paragraph [0010] (in part) is the following:

> ".. **The avatars can also interact with the document itself by, for example, selecting hypertext links in the document pages**. This gives the avatars the ability to provide customized presentations, or "guided tours" of documents... Further, the avatar system provides **the hypertext links in the document** ordered into a meaningful position by the avatar, thus offering strategies for information navigation.."

What is actually stated in paragraph [0059] is the following:

> "From the above-outlined description, it is obvious that the avatar is invoked when a link to the avatar is activated. **In HTML, links to particular locations in a document, or between locations in the same document, are made possible through the NAME attribute of the "A" anchor element**. The "A" anchor element marks a block of the document as a hypertext link. The block can be text, highlighted text, or an image. The "A" anchor element can take several attributes. At least one attribute must be either "HREF" or "NAME". "HREF" specifies the destination of the hypertext link, while "NAME" indicates that the marked text can itself be the destination of a hypertext link. If both attributes are present, the anchor is the beginning of one link and end of another link. The NAME attribute allows the avatar creator to assign a unique name, called a fragment identifier, **to a particular place in a document.** The avatar creator can then link this particular name location using a special form of URL that contains the name. The link can be made within the same document, or from any other document."

What is actually stated in paragraphs [0066-67] (in part) is the following:

> "[0066] In particular, the memory 750 contains an avatar animation engine, which may be a set of JAVA.TM. classes that can easily be integrated into applets or standalone JAVA.TM. applications. The primary class that an application needs to interface with encapsulates the run-time environment needed for avatar animation. When the controller 710 accesses the document 112 from the network 120, an image of a page of the document 112 is stored in the video RAM of the memory 750 and displayed on the display 250. **If the document 112 is modified to contain avatar links, the displayed page shows the avatar links in a color distinct from the normal hypertext links, and also displays the avatar 132 docked in a margin of the page**. ...

> [0067] In operation, a new avatar context is created and all the required avatar definition and script files are loaded. When the document reader 140 **clicks on an avatar link**, the first behavior/avatar pair associated with the link is performed. If necessary, the avatar 132 is removed from its docked position to the general location of the annotated object, and the avatar head 410, and possibly the avatar body 420, is rendered, prior to the performance beginning...."

That is, the "links" referred to are clearly those in a document with which the avatar is associated. These portions of Bickmore et al. are not read as teaching that the avatar *per se* comprises a bookmark component that comprises at least one address corresponding to a resource that is reachable by a user of the avatar through a data communications network.

This interpretation is buttressed by the disclosure of Bickmore et al. at paragraphs [0051-58], where the components of the avatar ASL (Avatar Scripting Language) are defined. It is not seen where there is a definition in the ASL of any component analogous to a bookmark component that comprises at least one address corresponding to a resource that is reachable by a user of the avatar through a data communications network.

Note further in this regard in paragraph [0056] that in the case of the AUDIO <identifier> primitive, that plays a specified audio file, the corresponding audio file "**must exist** in the same directory as the avatars ASL file". The AUDIO primitive is thus clearly not analogous to the claimed bookmark component that comprises at least one address corresponding to a resource that is reachable by a user of the avatar through a data communications network.

This being the case, the proposed combination of the teachings of Watanabe and Bickmore et al., which is not admitted is suggested or technically feasible, would not render the subject matter of claim 1 unpatentable.

This argument is applied as well to the rejection of independent claims 2, 4, 5 and 6, which each contain a similar recitation of the entity bookmark component.

Further, and by example only, the Examiner when rejecting claim 5 again refers to Watanabe at

col. 3, lines 18-45 and col. 12, lines 6-40 for purportedly teaching that an entity-enabled device includes an entity player for interpreting commands, and

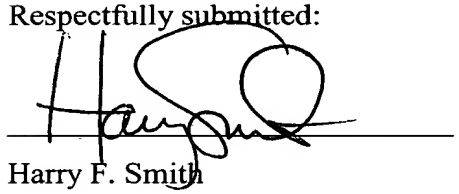
> "determining, by the entity player, whether the commands are compatible with the entity-enabled device; and
> interpreting, by the entity player, commands determined to be compatible with the entity-enabled device".

The cited portions of Watanabe have again been reviewed, and the subject matter found in claim 5 is simply not found. If the Examiner believes otherwise he is again respectfully requested to specifically point out where the claimed subject matter is purportedly found in Watanabe.

In that all of the independent claims are allowable over the proposed combination of Watanabe and Bickmore et al., then all of the dependent claims are allowable as well.

The Examiner is respectfully requested to reconsider and remove the rejection of claims 1-14 as last amended, and to allow claims 1-14.

Respectfully submitted:



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